

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)

Advanced Television Systems)

Their Impact Upon the)

Existing Television Broadcast Service)

MM Docket No. 87-268

FCC FILE ROOM

Sixth Further Notice of Proposed Rule Making

To: The Commission

COMMENTS OF
The County of San Mateo, CA

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INTRODUCTION

The County of San Mateo is immediately adjacent to the City and County of San Francisco. The County's population is approximately 680,000.

The County operates and maintains radio systems in the 480 MHz "T" (Television band) for the County Sheriff, County Emergency Medical Services (EMS), and Mutual-Aid systems which serve all 20 cities within the County. Cities which use the Mutual-Aid systems include:

Atherton	Foster City	Portola Valley
Belmont	Half Moon Bay	San Bruno
Brisbane	Hillsborough	San Carlos
Burlingame	Half Moon Bay	City of San Mateo
Colma	Menlo Park	South San Francisco
Daly City	Millbrae	Woodside
East Palo Alto	Pacifica	

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(These cities' primary public safety radio systems also operate on similar 480 MHz frequencies.)

There are approximately 500 mobile and portable radios in use by the County Sheriff and EMS, and an additional 3000 in use by the cities.

The County's radio systems operate between 482.3125 MHz and 491.9875 MHz, and are comprised of over 21 transmitters and 73 receivers, located at 22 different sites within the County.

Because of an acute shortage of frequencies in the VHF frequency bands in the San Francisco Bay Area, the County migrated to 480 MHz frequencies in the 1970's to provide capacity for a growing population. The County is considering replacement of their aging radio systems soon and has considered migration to the 800 MHz band. However, these frequencies have become extremely congested, and 800 MHz frequencies suitable for use in the County are no longer available. The County has concluded that it must remain on the 480 MHz band to maintain capacity for County and local government users.

COMMENTS

The County of San Mateo is deeply concerned with the proposal to license television transmitters on Channel 15 and on Channel 18 in the San Francisco area. In addition, the high powers listed in the proposal pose a significant potential for interference to San Mateo County's public safety radio systems. This is especially true for the County's receivers operating adjacent to Channel 18.

Furthermore, the County's use of television Channel 16 and 17 for their essential public safety communications could potentially cause interference to television receivers tuned to Channel 15 or 18 as mobile units roam within San Mateo County. The same would be true of the television receivers located in the vicinity of the fixed transmitters of the County.

San Mateo County is not opposed the concept of digital television, nor the assignment of DTV channels in the San Francisco area. However, it may be prudent to assign television channels with considerably more separation from the Channel 16 and 17 land mobile operations in this area. In fact, the Commission proposal provides for at least 176 km spacing between DTV stations and land mobile assignments. This is evidence of that there exists a potential for interference to and from land mobile operations. It also appears that such DTV assignments would be in violation of this required separation.

CONCLUSION

For the reasons stated above, the County of San Mateo respectfully requests the Commission to reconsider the assignment of Channels 15 and 18 for television services in the San Francisco Bay Area. Every effort should be made to identify alternate channels, which would better serve the television industry and the viewers without impacting the existing use of Channel 16 and 17 by the County of San Mateo for its vital public safety systems.

Respectfully submitted,

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